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*Attorneys for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ADRIANA CARCELEN,

Plaintiff,

VS.

CITIBANK, N.A., a national banking association; SYNCHRONY BANK, a foreign corporation; EQUIFAX INFORMATION SOLUTIONS, INC., a foreign limited-liability company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; and TRANS UNION LLC, a foreign limited-liability company;

## Defendants.

Case No. 2:19-cv-01533-APG-VCF

**JOINT MOTION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT SYNCHRONY BANK TO  
RESPOND TO COMPLAINT  
(SECOND REQUEST)**

COME NOW Plaintiff Adriana Carcelen (“Plaintiff”) and Defendant Synchrony Bank (“Synchrony”), by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension as follows:

## **STATEMENT OF JOINT MOTION**

1. On September 3, 2019, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on September 23, 2019.
3. Synchrony’s response to the Complaint was originally due by October 14, 2019.
4. On October 15, 2019, this Court granted Plaintiff’s and Synchrony’s Joint Motion for Defendant Synchrony Bank to Respond to Complaint (the “First Request”), extending the time within which Synchrony was to respond to the Complaint until November 4, 2019.

1       6. The Parties have engaged in preliminary discussions in this matter. Synchrony  
2 continues investigating the allegations and believes that it is possible for the parties to reach an early  
3 resolution. In order to explore the possibility of an early resolution, Synchrony desires a second  
4 extension until November 18, 2019, to file a response to the Complaint.

5       7. Counsel for Synchrony conferred with counsel for Plaintiff regarding this Stipulation.  
6 Counsel for Plaintiff agrees to the requested extension.

7       8. This Joint Motion is filed in good faith and not for dilatory or other improper purpose.  
8 Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of  
9 time and has consented to the requested extension.

10      9. This is the second request for extension of time for Synchrony to respond to the  
11 Complaint.

12 DATED: November 4, 2019.

13 /s/ Matthew Tsai  
14 Matthew Tsai  
15 Nevada Bar No. 14290  
16 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
17 3993 Howard Hughes Parkway, Suite 600  
18 Las Vegas, NV 89169

19 *Counsel for Defendant Synchrony Bank*

20 DATED: November 4, 2019.

21 /s/ Kevin L. Hernandez  
22 Kevin L. Hernandez  
23 Nevada Bar No. 12594  
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25 8872 S. Eastern Avenue, Suite 270  
26 Las Vegas, NV 89123

27 *Counsel for Plaintiff Adriana Carcelen*

28 **ORDER**

19 IT IS SO ORDERED.

20   
21 UNITED STATES MAGISTRATE JUDGE  
22 DATED: November 15, 2019